

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 05-10489-NMG

GLENN S. BATES,

Plaintiff

v.

CHRISTOPHER KENDER AND BARRY
MITCHELL,

Defendants

DEFENDANTS' PROPOSED SPECIAL
VERDICT QUESTIONS TO THE JURY

Question #1.

Was the force used by Christopher Kender in effecting the arrest of the plaintiff unreasonable?

Yes _____

No _____

Please go to Question #2.

Question #2.

Did Barry Mitchell use any force against plaintiff.

Yes _____

No _____

If your answer to both Question #2 and Question #1 is No, please go no further and advise the Clerk that you have reached a verdict.

If your answer to Question #2 is No, and your answer to Question #1 is Yes, please go to Question #4.

If your answer to Question #2 is Yes, regardless of what your answer to Question #1 is, please go to Question #3.

Question #3.

Was the force used by Barry Mitchell against plaintiff reasonable?

Yes _____

No _____

If your answer to Question #3 is Yes, please go to Question #4.

If your answer to Question #3 is No, and your answer to Question #1 is No, please go no further and advise the Clerk that you have reached a verdict.

Question #4.

What sum, if any, would fairly compensate the plaintiff for his claimed injuries?

Amount in Words (_____)

Amount by Figure (_____)

Please notify the Clerk that you have reached a verdict.

Jury Foreperson